UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

LUIS GARCIA, on behalf of himself and others similarly situated,

Case No. 17-CV-3130 (JMA) (ARL)

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Plaintiff,

-against-

SBKU SERVICES INC. d/b/a KUMO SUSHI & STEAKHOUSE, TONY LAM, BOBBY LAM, and JANE DOE,

Defendants.

PLAINTIFF'S NOTICE OF MOTION FOR ENTRY OF JUDGMENT FOR ATTORNEYS' FEES AND COSTS

PLEASE TAKE NOTICE that, pursuant Fed. R. Civ. P. 54(d), as well as 29 U.S.C. § 216(b) and New York Labor Law §§ 198(1-a) and 663(1), and upon the Declaration of Justin Cilenti, dated March 20, 2020, and the accompanying Memorandum of Law, plaintiff Luis Garcia ("Plaintiff"), by and through his counsel, Cilenti & Cooper, PLLC, hereby moves this Court, before the Honorable Joan M. Azrack, U.S.D.J., in the United States District Court for the Eastern District of New York, 100 Federal Plaza, Central Islip, New York 11722, for an Entry of Judgment in favor of Plaintiff's attorneys, Cilenti & Cooper, PLLC, against defendants SBKU Services Inc., Tony Lam, and Robert ("Bobby") Lam ("Defendants"), jointly and severally, for attorneys' fees and costs in the amount of \$55,807.10.

PLEASE TAKE FURTHER NOTICE that, pursuant to the schedule set forth between the parties, Defendants' opposition papers are to be filed on or before May 11, 2020; and, Plaintiff's reply papers, if any, are to be filed on or before May 25, 2020.

Dated: New York, New York March 20, 2020

Respectfully submitted,

CILENTI & COOPER, PLLC Attorneys for Plaintiff
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By:

Justin Cilenti

TO:

John P. Ruggiero, Esq. Canfield-Ruggiero, LLP 1461 Franklin Avenue Garden City, New York 11530 (516) 294-4180 Attorneys for Defendants